

# **EXHIBIT 6**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**THIS DOCUMENT RELATES TO:**

*The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*

Case No. 18-op-45090

*The County of Cuyahoga, Ohio, et al. v.  
Purdue Pharma L.P., et al.*

Case No. 1:18-op-45004

Track One-B

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF KEITH MILLER**

I, Keith Miller, hereby declare as follows:

1. I hold the position of IT Director for Discount Drug Mart, Inc. ("DDM"). I have held this position for approximately 3 years. In my current position, I oversee the team responsible for maintaining the systems that contain all DDM's retail pharmacy data and, where appropriate, satisfying requests for such data.

2. DDM has approximately 76 retail pharmacies, all located in Ohio.

3. DDM currently has 16 stores in Cuyahoga County. In 2018, DDM pharmacies filled 1,110,518 prescriptions in Cuyahoga County. In 2018, DDM pharmacies filled 5,935,904 prescriptions companywide (Ohio).

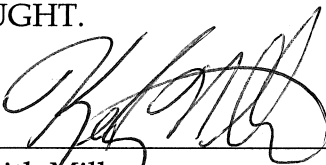
4. DDM's prescription-level data contains sensitive personal health information of our patients/customers. Such information is subject to HIPAA and other privacy laws.

5. We have approximately 20GB of dispensing data in our dispensing database. While there is uncertainty in estimating the amount of time needed for a massive transfer of data, and while the data fields subject to production have not been set, we estimate that it would take approximately one week for each year in total (10 hours of my working hours per week), if not longer, to produce prescription data on a statewide basis. This assumes the data fields are limited to basic prescription information (as in our sample) and are not changed midstream. This applies to data that is contained in our current system which goes back to June 1, 2014. Data from our old system will likely take longer and may involve the assistance of an outside vendor (we are currently investigating). Depending on the scope of the data and what form it is to be furnished, we may require the assistance of an outside vendor in this process as well. This would require additional time and expense to the process.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on December 20, 2019.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
Keith Miller

SWORN TO AND SUBSCRIBED IN MY PRESENCE on this 20th day of  
December, 2019.

Marcia G. Rager  
NOTARY PUBLIC



MARCIA G. RAGER  
NOTARY PUBLIC, STATE OF OHIO  
COMMISSION EXPIRES JULY 6, 2020